

EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

BRIAN [MICHAEL] ALEXANDER,

Plaintiff,

Hon. Janet Neff

-v-

File No. 1:18-cv-930

STEVEN J. KWASNIK and
ANNIE HARRISON,

Defendants.

J. Nicholas Bostic (P40653)
Attorney for Plaintiffs
909 N. Washington Ave.
Lansing, MI 48906
(517) 706-0132

Bonnie G. Toskey (P30601)
Sarah K. Osburn (P55539)
Cohl, Stoker & Toskey
Attorneys for Defendants
601 N. Capitol Avenue
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AFFIDAVIT OF ANNIE HARRISON

Annie Harrison, being first duly sworn, avers as follows:

1. I make this affidavit on the basis of personal knowledge, and am competent to so testify if called as a witness at a trial or hearing.
2. I am, and at all relevant times was, a Deputy Sheriff of Ingham County.
3. On January 13, 2015, I presented Ingham County Assistant Prosecuting Attorney Debra Rousseau with a warrant request, seeking to charge Brian Michael Alexander with Criminal Sexual Conduct involving his adolescent step-daughter.

4. Ingham County Assistant Prosecuting Attorney Rousseau reviewed the details of the investigation, including interviews of the victim, the victim's mother, and others, and authorized the issuance of an arrest warrant charging four (4) counts of 2nd Degree Criminal Sexual Conduct under MCL 750.520c(1)(b) (victim at least 13 but less than 16 years of age) against Brian Alexander. The Ingham County Prosecutor's Office warrant procedure required the review and approval of a second Attorney, which review and approval was provided by Assistant Prosecuting Attorney Michael Cheltenham.

5. The decision to authorize the issuance of the arrest warrant and to commence prosecution of Brian Alexander was not mine. My duty and responsibility is to make a request or recommendation to a prosecuting attorney, and then to step back and allow the prosecutor to make any such determination independently; I neither influenced nor did I cajole, urge, or otherwise prevail upon Assistant Prosecuting Attorney Rousseau to subordinate her independent judgment to my own.

6. Notwithstanding later developments with the victim's clarification regarding her school attendance on the date of the last assault, regarding which I had no knowledge, the information I provided to Ingham County Assistant Prosecuting Rousseau on January 13, 2015 remains, to the best of my knowledge, truthful, accurate, and complete. I did not learn of the victim's clarification regarding her school attendance until the victim actually testified at trial.

7. I did attend a trial preparation meeting on August 13, 2015 at the Ingham County Prosecutor's Office which included the victim, Assistant Prosecuting Attorney Steven Kwasnik, Ingham County Victim Rights Specialist Marissa Berry and me. I prepared a supplemental report following that meeting. (See Detective Annie Harrison's

Daily Activity Report for August 13, 2015 attached as Exhibit A and Supplemental Report dated August 15, 2015 attached as Exhibit B).

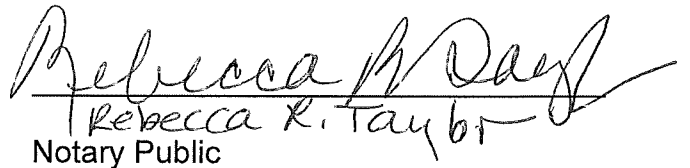
8. The claim of Brian Alexander that I was present along with Assistant Prosecuting Attorney Steven Kwasnik, at the second trial preparation meeting held at the Courtroom with the victim on August 25, 2015 when the victim clarified certain details regarding the school day events leading up to the last assault is without basis in fact. I was not present at the August 25, 2015 second trial preparation meeting attended by Assistant Prosecuting Attorney Kwasnik and the victim to prepare the victim for trial. (See Detective Annie Harrison's Daily Activity Report for August 25, 2015 attached as Exhibit C).

Further affiant says naught.



Annie Harrison

Subscribed and sworn before me this 15th day of March, 2019.



Rebecca R. Taylor
Notary Public

REBECCA R. TAYLOR
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF EATON
My Commission Expires February 11, 2023
Acting in the County of Ingham

Exhibit 1-A

INGHAM COUNTY SHERIFF'S OFFICE
DAILY ACTIVITY REPORT

Name ANNIE HARRISON Badge 5371 Date 8.13.15 Shift Days Unit D36

File Class	Hours	Activity	Hours	Activity	Hours	Activity	#
11007	3.5	Administrative	2.0	Extra Delhi		Felony Arrests	
11001	1.5	Briefing		Extra Webberville		Misdemeanor Arrests	
		Reports		Asst. Other Dept.		Civil Arrests	
		On-Duty Court Time	1.5	VCI		Total Arrests	
		Vehicle Maintenance				Self-Initiated	
		Break	1.5				
		Training				Vehicle Number	36
		Background Invest.				Total Vehicle Mileage	
# Original Rpt.		Photographs		Interviews with:	#		
# Blotter Rpt.		Subpoena		Victim	1		
# Supplement Rpt.	1	Forfeitures		Suspect			
		Extraditions		Witness		Warrant Requests Made	
Personal Leave		Line Ups		Forensic	#	Misd. Warrants Issued	
Sick Time		Evidence		# of Meetings		Fel Warrants Issued	
Vacation		Warrants		# of Polygraphs		Juv. Petitions Issued	
Overtime Hours		Surveillance					
		Special Assignment				No. Persons Invest.	
		Liquor License					
Total Hours	9	Firearms License					

Start	Cleared	Type	Comp. Number	File Class
0800		Off admin		
0830		3D+H Ct-Ambler	14.05210	11001
1000	Supp	Pros Off, (V)int	15.00205	11007
1200		10.7		
1230		Off cases, reports,		
	1700	final prep		

Signature 

Exhibit 1-B

Agency: Ingham County Sheriffs Office
Officer ID/Name: 5371 \ ANNIE HARRISON
Date: 8/17/2015 12:00:00AM

Incident
Incident Number: 15-00205
Case Number: 15-00205

Narrative Title: **SUPPLEMENTAL DICTATION BY:**

COMPLAINT NUMBER: 15-00205
FILE CLASS: 11007/Criminal Sexual Conduct
ORIGINAL DATE: 1-8-15
SUPP. DATE: 8-14-15

SUPPLEMENTAL INFORMATION

I conducted continued investigation through 8-14-15

SCHOOL ATTENDANCE RECORDS

Jan Dodge and Kristie Hagerman
Holt Public Schools
5780 W. Holt Rd
Holt MI 48842
517-694-0401

I received the attached attendance records from JAN DODGE at Holt Public Schools Administration. She provided me with the attendance records and record keys. She advised KRISTIE HAGERMAN would have been in charge of the attendance records.

VICTIM CONTACT

On 8-13-15 I spoke to the victim, MADISON BOSTWICK, while she was at the Ingham County Prosecutor's Office, after meeting with the Prosecutor.

MADISON is no longer living with her mother because things became too difficult and painful for her to be there. MADISON said her mother has told her many times that she doesn't believe her and she calls her a "manipulative liar" or a "liar." STEFANI has told MADISON more than once, "I feel so bad for him (BRIAN)."

MADISON was still living with her mom at the time of the preliminary exam. MADISON said after she testified, her mom STEFANI went over to BRIAN and the defense team in the hallway and socialized. MADISON said this was extremely hurtful to her. MADISON said, "I was sad." "That was the point that I lost a lot of hope." MADISON said before she testified STEFANI acted supportive in front of other people, but "behind the scenes at home it was a different story. She would never be supportive of me at home." MADISON said typically STEFANI would just pretend it wasn't happening and say nothing to her about it at all. STEFANI would frequently leave with the younger kids to be with BRIAN and leave MADISON home and be dishonest to her about where she was.

MADISON said this has "dramatically" changed her life. MADISON said her mom doesn't support her at all. Instead MADISON tried to support her mother. "I was always trying to help her instead of her helping me."

MADISON was completely unaware that she was being recorded in the restaurant by STEFANI. Prior to the recording begins, MADISON said STEFANI told her that she knows they don't usually talk about it and she wanted to talk about it. MADISON thought STEFANI was going to try to improve their relationship. MADISON was shocked to learn of the recording and realizes that STEFANI's intent was to record her and not to be sincere about trying to talk about things.

SEARCH WARRANT

On 8-12-15 I swore to a search warrant to take crime scene photographs at 2100 Moorwood Drive.

On 8-13-15 DET BRAD DELANEY and I went to 2100 Moorwood Dr to execute the search warrant. Photographs are provided on a cd.

While I was taking photographs I observed locks on the exterior of doors, including the children's bedrooms. I asked STEFANI why there were locks on the exterior of the children's bedrooms. She didn't answer me. I asked her again and she said she heard my question the first time and she was not going to answer me or tell me about the locks. I asked her where she stood on the case. She said I already knew where she stood on it. I told her I would like to talk about her recording MADISON. She said she wasn't going to talk about it with me because she doesn't trust me. She said she was going to record me. She said

Agency: Ingham County Sheriffs Office
Officer ID/Name: 5371 \ ANNIE HARRISON
Date: 8/17/2015 12:00:00AM

Incident
Incident Number: 15-00205
Case Number: 15-00205

Narrative Title: **SUPPLEMENTAL DICTATION BY:**

she needed to consult an attorney.

I served the return and tabulation on STEFANI ALEXANDER.

The file is with the court.

PHOTOGRAPHS

Image 001- 005 Exterior

Image 006 - 020 Main level

Image 021 - 040 Basement

Image 041 - 042 Leading to 2nd level

Image 5712, 5713, 5714, 5715 were taken on 7-29-15 of the exterior

Image 6035 - 6047 Basement

Image 6048 - 6083 2nd level

TRANSCRIPT

A transcript of the original interview with BRIAN ALEXANDER was provided.

DISPOSITION

This report will remain on file at the Ingham County Sheriff's Office, Central Records Division. A copy of this report will be forwarded to CPS.

STATUS

Open, pending prosecution.

Respectfully submitted,

Reviewed by,

Det. Annie Harrison, Badge 5371

Exhibit 1-C

INGHAM COUNTY SHERIFF'S OFFICE
DAILY ACTIVITY REPORT

Name ANNIE HARRISON Badge 5371 Date 8.25.15 Shift Days Unit D36

File Class	Hours	Activity	Hours	Activity	Hours	Activity	#
<u>11001</u>	<u>7.0</u>	Administrative	<u>1.0</u>	Extra Delhi		Felony Arrests	
		Briefing		Extra Webberville		Misdemeanor Arrests	
		Reports	<u>4.0</u>	Asst. Other Dept.		Civil Arrests	
		On-Duty Court Time		VCI		Total Arrests	
		Vehicle Maintenance				Self-Initiated	
		Break	<u>1.5</u>				
		Training				Vehicle Number	36
		Background Invest.				Total Vehicle Mileage	
# Original Rpt.	<u>1</u>	Photographs		Interviews with:	#		
# Blotter Rpt.		Subpoena		Victim			
# Supplement Rpt.		Forfeitures		Suspect	<u>1</u>		
		Extraditions		Witness	<u>1</u>	Warrant Requests Made	
Personal Leave		Line Ups		Forensic	<u>2</u>	Misd. Warrants Issued	
Sick Time		Evidence		# of Meetings		Fel Warrants Issued	
Vacation		Warrants		# of Polygraphs		Juv. Petitions Issued	
Overtime Hours	<u>4.5</u>	Surveillance					
		Special Assignment				No. Persons Invest.	
		Liquor License					
Total Hours	<u>12.5</u>	Firearms License					

Start	Cleared	Type		Comp. Number	File Class
<u>0910</u>			<u>Off admin, cases, 10.7 reports</u>		
<u>1430</u>	<u>C</u>		<u>Off CSC</u>	<u>15.07298</u>	<u>11001</u>
<u>1500</u>			<u>1253 Harper Apt B</u>		
<u>1530</u>			<u>CAC, Forensic + (W)</u>		
<u>1700</u>			<u>1253 Harper Apt B Forensic</u>		
<u>1800</u>			<u>Off (S) interview, arrest,</u>		
	<u>2130</u>		<u>TOT property, 10.42</u>		

Signature 